HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 AT TACOMA 7 ORBRIDGE LLC, 8 Plaintiff, NO. 3:20-cv-6259-BJR 9 STIPULATED MOTION AND ORDER v. 10 TO EXTEND CASE DEADLINES SAFARI LEGACY, INC. and PRATIK 11 PATEL, 12 Defendants. 13 **STIPULATED MOTION** 14 Plaintiff, Orbridge LLC, and Defendants Safari Legacy, Inc. and Pratik Patel (collectively, 15 the "Parties"), jointly move the Court to amend the scheduling order (Dkt. No. 40) and extend 16 deadlines in this case. In support of this Stipulated Motion, the Parties state the following: 17 1. On June 28, 2021, the Court entered a scheduling order setting case deadlines. 18 (Dkt. No. 40). The discovery deadline was set for October 13, 2021. 19 2. The Parties have engaged in discovery. However, the Parties seek an extension to 20 allow additional time to complete discovery, and specifically to take the depositions of Safari 21 Legacy, Inc., Pratik Patel, and a former employee of Safari Legacy, Jennifer Kunath.

1	3.	Ms. Kunath's deposition was sched	luled for September 2021, but her father died
2	earlier that same month. Her deposition has now been rescheduled for October 22, 2021, which is		
3	after the current discovery deadline.		
4	4. Moreover, scheduling the depositions of Safari Legacy, Inc. and Mr. Patel have		
5	been difficult. Their depositions were scheduled for October 6, 2021, but had to be postponed.		
6	The Parties expect those depositions to take place in November 2021.		
7	5. The Parties have conferred and jointly request that the discovery and dispositive		
8	motions deadlines be extended as follows, or to similar dates at the Court's preference:		
9	Discov	very completed by:	November 19, 2021
10	All dis	spositive motions must be filed by:	December 17, 2021
11	6. The Parties do not request any changes to the following dates previously set by		
12	the Court:		
13	All mo	otions in limine must be filed by:	March 7, 2022
14	Joint Pretrial Statement:		March 14, 2022
15	Pretrial conference:		March 28, 2022
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RESPECTFULLY SUBMITTED this 5th day of October, 2021. 1 2 /s/ Rodney E. Gould /s/ Lucio E. Maldonado RODNEY E. GOULD, admitted pro had vice Lucio E. Maldonado, WSBA No. 54279 3 ANDREW D. BLACK, admitted pro had vice CORR CRONIN LLP SMITH DUGGAN BUEL & RUFO LLP 1001 4th Avenue, Suite 3900 4 55 Old Bedford Road Seattle, WA 98154-1051 Lincoln, MA 01773 (206) 625-8600 Phone; 5 Phone: 617-228-4400 (206) 625-0900 Fax Email: rgould@SmithDuggan.com lmaldonado@correronin.com 6 Andrew.Black@SmithDuggan.com 7 /s/ Robert L. Christie /s/ Jeffery Ment Jeffery Ment, Admitted Pro Hac Vice ROBERT L. CHRISTIE, WSBA #10895 8 CHRISTIE LAW GROUP, PLLC Ment Law Group, PC 225 Asylum Street, 15th Floor 2100 Westlake Avenue N., Suite 206 9 Seattle, WA 98109 Hartford, CT 06103 Phone: 206-957-9669 Telephone: (860) 969-3200 10 Email: bob@christielawgroup.com jment@mentlaw.com 11 Attorneys for Orbridge LLC Attorneys for Defendant Safari Legacy, Inc. and Pratik Patel 12 13 **ORDER** 14 The Parties jointly moved the Court for an extension of discovery and other deadlines. 15 The discovery and dispositive motions deadlines are extended to the following dates: 16 Discovery completed by: November 19, 2021 17 All dispositive motions must be filed by: December 17, 2021 18 All other remaining case deadlines remain the same. 19 IT IS SO ORDERED. 20 Dated this 5th day of October, 2021. 21 Barbara Jacobs Rothstein U.S. District Court Judge